

Draft-Proposed Statement of Basis - Narrative

Title V Permit

Type of Permit Action: TV Renewal

Facility: Harvest - Pump Mesa Central Delivery Point
Company: Harvest Four Corners LLC
Permit No(s): 0867- M6 through M6R7 and P037-R4
Tempo/IDEA ID No.: 1273 - PRT20200001
Permit Writer: Urshula Bajracharya

Fee Tracking (not required for Title V)

Tracking	NSR tracking entries completed: <input type="checkbox"/> Yes <input type="checkbox"/> No	
	NSR tracking page attached to front cover of permit folder: <input type="checkbox"/> Yes <input type="checkbox"/> No	
	Paid Invoice Attached: <input type="checkbox"/> Yes <input type="checkbox"/> No	
	Balance Due Invoice Attached: <input type="checkbox"/> Yes <input type="checkbox"/> No	
	Invoice Comments:	

Permit Review	Date to Enforcement: TBD	Date of Enforcement Reply: TBD
	Date to Applicant: 2/7/2022	Date of Applicant Reply: TBD
	Date to EPA: 2/7/2022	Date of EPA Reply: TBD or N/A
	Date to Supervisor: 1/20/2022	

1.0 Plant Process Description:

The Pump Mesa CDP compresses and dehydrates natural gas for pipeline transmission. Natural gas is received from independent producers and metered as it enters the facility. The gas is compressed for pipeline transmission using compressors driven by natural gas-fired reciprocating internal combustion engines (RICE). The gas stream is then routed to TEG dehydrators which further dehydrate the stream.

2.0 Description of this Modification:

This Title V renewal permit is incorporating changes made in the NSR permits. In this permit the facility is replacing a Waukesha L7042GL natural gas-fired compressor engines (Unit 1, 3 and 4) with an identical unit, removing five Waukesha L7042GL natural gas-fired compressor engines (Units 10-14) and four dehydrators (Units 15a/b, 16a/b, 18a/b & 20a/b) from the permit and changing the source unit number designation for SSM emissions from Unit "1a-14a" to Unit "SSM".

3.0 Source Determination:

1. The emission sources evaluated include the entire facility.

2. Single Source Analysis:

- A. SIC Code: Do the facilities belong to the same industrial grouping (i.e., same two-digit SIC code grouping, or support activity)? Yes

B. Common Ownership or Control: Are the facilities under common ownership or control?
Yes

C. Contiguous or Adjacent: Are the facilities located on one or more contiguous or adjacent properties? Yes

3. Is the source, as described in the application, the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes? Yes

4.0 PSD Applicability:

Title V action does not determine PSD applicability; see the History Table for a summary of previous PSD applicability determinations. However, this facility is a PSD major source that has never undergone a permitting action for a PSD major modification.

5.0 History (In descending chronological order, showing NSR and TV): *The asterisk denotes the current active NSR and Title V permits that have not been superseded.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
*P037R4		Renewal	Title V renewal
*0867M6R7	6/15/2021	Admin Rev	Like kind engine replacement-Unit 9
*0867M6R6	12/17/2019	Admin Rev	Like kind engine replacement-Unit 3
*0867M6R5	4/12/2019	Admin Rev	Like kind engine replacement-Unit 4
*0867M6R4	4/11/2019	Admin Rev	Removal of compressor engines unit 10-14 and dehydrator and associated units 15a/b, 16a/b, 18a/b and 20a/b.
*0867M6R3	12/19/2018	Admin Rev	Change in ownership
*0867M6R2	6/1/2018	Admin Rev	Like kind engine replacement-Unit 1
P037R3	12/9/2016	Renewal	Title V renewal
*0867M6R1	3/25/16	Admin rev	Add 1000 gal produced water drip tank as exempt equipment
*0867M6	4/27/15	Reg – Significant Modification	Increase dehydrator still vent emissions (units 15a-20a) and SSM emissions from compressor and piping, add malfunctions emission limit of 10 TPY VOC, change unit 16 to TBD because unit was removed, add 3 exempt tank heaters, and update exempt liquid storage tank listing. This is an existing major PSD source but the increase in emissions of 36.9 TPY for VOCs is less than its significant emission rates in Table 2 in 20.2.74.502.
P037R2 and 0867M5-R3	9/21/14	Admin Permit Revision	Update serial number and manufacture date for like-kind engine replacement for unit #9
P037R2 and 0867M5-R2	5/5/14	Admin Permit Revision	Update serial number and manufacture date for like-kind engine replacement for unit #8
0867M5-R1	4/10/14	Admin Permit Revision	Correct and/or provide current serial numbers for various engines and skid packages alongside manufactured dates

5.0 History (In descending chronological order, showing NSR and TV): *The asterisk denotes the current active NSR and Title V permits that have not been superseded.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
0867M5	4/9/10	Reg – Significant Modification	Update dehydrator emissions, add SSM compressor blowdown emissions, and account for sulfur dioxide and particulate emissions for currently permitted equipment.
P037R2	12/20/10	Renewal	TV Renewal. Update storage tank information, remove T-35, add T-36 through T-38. All of these tanks are and continue to be insignificant activities.
P037R1M2 and 0867M4R8	9/14/06	Admin Permit Revision	Changed names for permitted owner from Williams Field Services Co. to Williams Four Corners, LLC. Notification submitted 8/22/06.
P037R1M1	6/21/06	Admin Amendment	Changed Responsible Official to Don Wicburg, Director Four Corners Area, on June 02, 2006.
0867M4R7	11/22/05	Admin Permit Revision	Corrected an error from unit 16 to 20 to represent 10 mmscfd (along with unit 15) to complete the inventory to include two (2) 10 mmscfd dehydrators and four 20 mmscfd dehydrators.
0867M4R6	8/25/05	Admin Permit Revision	Corrected a discrepancy for unit 16, a glycol dehydrator, from 20mmcf to 10 mmcf and decreasing VOC emissions to 1.2 tpy. This resulted in total facility VOC emissions of 96.8 tons/y. Information in Title V was correct and did not need to be changed.
P037R1	3/30/05	Renewal	
0867M4R5	12/3/04	Admin Permit Revision	Williams submitted an inventory for all reciprocating-internal-combustion-engine-driven and turbine-driven equipment. Williams will now track these emission sources using a unit package serial number instead of the engine serial number since the engines go through a like-kind engine replacement often. The unit package serial number is located on the control panel for the unit. Using the unit package serial number will help keep track of the unit in accordance with RICE MACT 40 CFR 63, Subpart ZZZZ. Submittal of the inventory complies with the conditions specified in NOV# WIL-1006-0301.
0867M4R4	3/23/04	Admin Revision	Like kind engine replacement for a Waukesha 7042GL, emission unit number 13, from C-11192/2 to C-11059/1.
0867M4R3	1/22/04	Admin Revision	Like kind engine replacement for a Waukesha 7042GL, emission unit number 14, from C-11177/1 to C-11903/1.
0867M4R2	6/19/03	Admin Revision	Like kind engine replacement for a Waukesha 7042GL, emission unit number 12, from C-10461/9 to C-10985/2.

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Permit Number	Issue Date	Action Type	Description of Action (Changes)
0867M4R1	??	Admin Permit Revision	2 letters issued with the same number. One is dated 9/11/01 – unit 5 identical engine replacement, new serial number is 141428; unit 4 identical engine replacement, new serial number C-11888/1; unit 6 identical engine replacement, new serial number C-10607/9. The other letter is dated 4/14/99 – unit 16 description is revised from 10MMscfd to 20MMscfd; emissions will not change.
P037	9/30/99	New TV	
0867M4	7/21/97	Modification	Allowed the existing fourteen (14) Waukesha LGL engines to operate at 1363 site-rated hp (derated from 1478 hp) at 1200 rpm, by allowing installation of high speed turbochargers. The engines may continue to operate at low speed turbochargers. Permit supersedes all portions of 0867M3, except the portion requiring compliance tests.
0867M3	5/10/94	Modification	Fourteen (14) identical Waukesha RICE engines. Supersedes Permit 0867M2
0867M2	12/1/92	Modification	Twelve Waukesha engines
0867M1	1/10/92	Modification	Seven Waukesha engines. Supersedes Permit 0867.
0867	1/17/91	Initial NSR	Six Waukesha engines
*P037R3	Current Action	Renewal	Title V renewal
*0867M6R1	3/25/16	Admin rev	Add 1000 gal produced water drip tank as exempt equipment
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6.0 Public Response/Concerns: As of **date in the draft** or the issuance date of this permit, this permit writer is not aware of any public comment or concern.

7.0 Compliance Testing:

Unit No.	Compliance Test	Test Dates
1	NO2 and CO portable analyzer testing	11/14/2019
2	NO2 and CO portable analyzer testing	N/A
3	NO2 and CO portable analyzer testing	11/13/2019
4	NO2 and CO portable analyzer testing	11/13/2019
5	N/A	Not Installed
6	N/A	Not Installed
7	N/A	Not Installed
8	NO2 and CO portable analyzer testing	12/19/2019
9	NO2 and CO portable analyzer testing	11/12/2019

8.0 Startup and Shutdown:

- A. If applicable, did the applicant indicate that a startup, shutdown, and emergency operational plan was developed in accordance with 20.2.70.300.D(5)(g) NMAC? Yes
- B. If applicable, did the applicant indicate that a malfunction, startup, or shutdown operational

plan was developed in accordance with 20.2.72.203.A.5 NMAC? Yes

- C. Did the applicant indicate that a startup, shutdown, and scheduled maintenance plan was developed and implemented in accordance with 20.2.7.14.A and B NMAC? Yes
- D. Does the facility have emissions due to routine or predictable startup, shutdown, and maintenance? If so, have all emissions from startup, shutdown, and scheduled maintenance operations been permitted? Yes

9.0 Compliance and Enforcement Status [Title V and NSR/PSD new or modification. Use this email template:

Awaiting information from compliance and enforcement.

10.0 Modeling:

This is a Title V permit and modeling is not required for this permitting action. Modeling was waived for permitting action 0867M6 per AQB's Eric Peters on 1/22/15. As part of the 0867M5 permitting action in 2010, a waiver for modeling was issued for SO₂, TSP, and PM₁₀; modeling for PM_{2.5} was reviewed and approved (Gi-Dong Kim, 2/17/10). Modeling of NO_x and CO was conducted in 1997 for 0867-M4.

11.0 State Regulatory Analysis(NMAC/AQCR):

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.1	General Provisions	Yes,	Entire Facility	The facility is subject to Title 20 Environmental Protection Chapter 2 Air Quality of the New Mexico Administrative Code so is subject to Part 1 General Provisions, Update to Section 116 of regulation for Significant figures & rounding. Applicable with no permitting requirements.
2.3	Ambient Air Quality Standards	No		20.2.3.9 NMAC, LIMITATION OF APPLICABILITY TO 20.2.70 NMAC. The requirements of NMAAQs are not applicable requirements under 20.2.70 NMAC, as defined by 20.2.3.9 NMAC, 20.2.3.9 NMAC does not limit the applicability of this part to sources required to obtain a permit under the minor NSR regulation, 20.2.72 NMAC, nor does it limit which terms and conditions of NSR permits issued pursuant to 20.2.72 NMAC are applicable requirements in a Title V permit.
2.7	Excess Emissions	Yes	Entire Facility	Applies to all facilities' sources
2.61	Smoke and Visible Emissions	Yes	1-9, 17b & 19b	This regulation that limits opacity to 20% applies to Stationary Combustion Equipment, such as engines, boilers, heaters, and flares unless your equipment is subject to another state regulation that limits particulate matter such as 20.2.19 NMAC (see 20.2.61.109 NMAC). If equipment at your facility was subject to the repealed regulation 20.2.37 NMAC it is now subject to 20.2.61 NMAC.
2.70	Operating Permits	Yes	Entire Facility	The source is a Title V Major Source as defined at 20.2.70.7 NMAC.

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.71	Operating Permit Fees	Yes	Entire Facility	Source is subject to 20.2.70 NMAC as cited at 20.2.71.109 NMAC.
2.72	Construction Permits	Yes	Entire Facility	NSR Permits are the applicable requirement, including 20.2.72 NMAC.
2.73	NOI & Emissions Inventory Requirements	Yes	Entire Facility	Applicable to all facilities that require a permit. PER > 10 tpy for a regulated air contaminant.
2.74	Permits-Prevention of Significant Deterioration	Yes	Entire Facility	20.2.74.7.AG (2) A stationary source not listed in Table 1 of this Part (20.2.74.501 NMAC) and which emits or has the potential to emit stack emissions of two hundred fifty (250) tons per year or more of any regulated pollutant
2.75	Construction Permit Fees	No	Entire Facility	No, in accordance with 20.2.75.11.E an annual NSR enforcement and compliance fee shall not apply to sources subject to 20.2.71 NMAC.
2.77	New Source Performance Standards	No	See Sources subject to 40 CFR 60	Applies to any stationary source constructing or modifying and which is subject to the requirements of 40 CFR Part 60.
2.78	Emissions Standards for HAPs	No	See Sources subject to 40 CFR 61	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 61.
2.79	Permits Nonattainment Areas	No		This facility is not located in, nor does it affect, a nonattainment area. Link to Non-attainment Link areas
2.82	MACT Standards for Source Categories of HAPs	Yes	See sources subject to 40 CFR 63	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63.

12.0 Federal Regulatory Analysis:

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
Air Programs Subchapter C (40 CFR 50)	National Primary and Secondary Ambient Air Quality Standards	Yes	Entire Facility	Independent of permit applicability; applies to all sources of emissions for which there is a Federal Ambient Air Quality Standard.
NSPS Subpart A (40 CFR 60)	General Provisions	Yes	See sources subject to a Subpart in 40 CFR 60	Applies if any other subpart applies.
40 CFR Part 60 Subpart	Standards of Performance for	Potentially Yes	Units 1 – 4, 8 & 9	The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
JJJJ (Quad-J)	Stationary Spark. Ignition Internal Combustion Engines			combustion engines (ICE) as specified in paragraphs (a)(1) through (5) of section 60.4230. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. Link to regulation – read more
NSPS 40 CFR Part 60 Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015	Potentially Yes	Units 5 - 7	This regulation may apply if equipment is replaced or Units 5-7 are installed. Note that the facility is not a natural gas processing plant as defined by the subpart (see §60.5430a)
NESHAP Subpart A (40 CFR 61)	General Provisions	No	See sources subject to a Subpart in 40 CFR 61	Applies if any other subpart applies.
MACT Subpart A (40 CFR 63)	General Provisions	Yes	See sources subject to a Subpart in 40 CFR 63	Applies if any other subpart applies.
40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities –	Yes	Unit 17a & 19a	AREA SOURCE (Minor for HAPs): The facility contains affected sources (TEG glycol dehydrators, 63.760(b)(2)). The actual benzene emissions are greater than one ton per year. The area source IS NOT located within an Urban-1 county or UC boundary, 63.760(f)(3). the dehydrators are exempt and must comply on with 40 CFR 63.772(b).
40 CFR 63 Subpart ZZZZ (Quad Z)	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion	Potentially Yes	Units 1 – 4, 8 & 9.	The station is subject to ZZZZ as a major HAP source under 63.6585 (a) and (b), but the currently installed existing RICE (units 1-4, 8, and 9) do not have to meet the requirements in this subpart or in subpart A including initial notification under 63.6590 (b)(3)(ii): Existing spark ignition 4 stroke lean burn (4SLB) stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions. A major HAP source for this subpart is defined in 63.6585

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
	Engines (RICE MACT)			

13.0 Exempt and/or Insignificant Equipment that do not require monitoring:

Title V - Insignificant Activities (Dated March 24, 2005) as defined by 20.2.70.7.QNMAC:

[Insignificant List Link](#)

Unit Number	Source Description	Make	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction ²
			Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1. a)	Date of Installation /Construction ²
21	Tank Heater			0.325	20.2.72.202.B(5)	21
				MMBtu/hr	IA #1.a & 1.b	
22	Tank Heater			0.325	20.2.72.202.B(5)	22
				MMBtu/hr	IA #1.a & 1.b	
23	Tank Heater			0.325	20.2.72.202.B(5)	23
				MMBtu/hr	IA #1.a & 1.b	
T1-T9	Lubrication Oil Storage Tank			500	20.2.72.202.B(2)	T1-T9
				gal	IA #5	
T10-T14	Lubrication Oil Storage Tank			500	20.2.72.202.B(2)	T10-T14
				gal	IA #5	
T15, T16, T18 & T20	TEG Storage Tank			100	20.2.72.202.B(2)	T15, T16, T18 & T20
				gal	IA #5	
T17 & T19	TEG Storage Tank			100	20.2.72.202.B(2)	T17 & T19
				gal	IA #5	
T21, T22, T24 & T26	TEG Storage Tank			50	20.2.72.202.B(2)	T21, T22, T24 & T26
				gal	IA #5	
T23 & T25	TEG Storage Tank			50	20.2.72.202.B(2)	T23 & T25
				gal	IA #5	
T27	Produced Water Storage Tank			12,600	20.2.72.202.B(5)	T27
				gal	IA #1.a & 1.b	
T28	Produced Water			8,820	20.2.72.202.B(5)	T28

Unit Number	Source Description	Make	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction ²
			Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item	Date of Installation
	Storage Tank			gal	IA #1.a & 1.b	
T29	Lubrication Oil Storage Tank			4,200	20.2.72.202.B(2)	T29
				gal	IA #5	
T30	Used Oil Storage Tank			6,888	20.2.72.202.B(2)	T30
				gal	IA #5	
T31	Waste Water Storage Tank			6,930	20.2.72.202.B(2)	T31
				gal	IA #5	
T32	Produced Water Storage Tank			6,888	20.2.72.202.B(5)	T32
				gal	IA #1.a & 1.b	
T33	Water-Based Degreaser Storage Tank			300	N/A - tank is not an emissions source	T33
				gal	It is listed for information only	
T34	Antifreeze Storage Tank			500	20.2.72.202.B(2)	T34
				gal	IA #5	
T36	Corrosion Inhibitor Storage Tank			225	20.2.72.202.B(5)	T36
				gal	IA #1.a & 1.b	
T37	TEG Storage Tank			500	20.2.72.202.B(2)	T37
				gal	IA #5	
T38	Methanol Storage Tank			4,200	20.2.72.202.B(5)	T38
				gal	IA #1.a & 1.b	
T39	Used Oil (Filters) Storage Tank			126	20.2.72.202.B(2)	T39
				gal	IA #5	

14.0 New/Modified/Unique Conditions (Format: Condition#: Explanation):

- A. Removed Unit 10-14 in Conditions A110.A, A111.A, A201.A, A201.B, A201.C and A201.D.
- B. Removed Unit 15a, 16a, 18a and 20a in Conditions A202.A, A202.B and A202.C.
- C. Removed Unit 15b, 16b, 18b and 20b in Conditions A111.A.

15.0 For Title V action: Cross Reference Table between NSR Permit 0867M6 and TV Permit P037R4:

Changed by TV*	NSR Condition #	TV Section #
	A100 Introduction	A100 Introduction
	A101 Permit Duration	A101 Permit Duration
	A102 Facility Description	A102 Facility Description
	Table 102.A Total Potential Emissions	Table 102.A Total Potential Emissions
	A103 Facility: Applicable Regulations	A103 Facility: Applicable Regulations
	A104 Facility: Regulated Sources	A104 Facility: Regulated Sources
	A105 Facility: Control Equipment	A105 Facility: Control Equipment
	A106 Facility: Allowable Emissions	A106 Facility: Allowable Emissions
	A107 Facility: Allowable SSM	A107 Facility: Allowable SSM
		A107.C SSM
		A107.D Malfunction
	A108 Facility: Hours of Operations	A108 Facility: Hours of Operations
	A109 Facility: Reporting Schedules NR for NSR	A109 Facility: Reporting Schedules
	A110 Facility: Fuel Sulfur Requirements	A110 Facility: Fuel Sulfur Requirements
	A201.A Engines: Periodic Testing (Units XXX)	A201.A Engines: Periodic Testing (Units XXX)
	A201.D MACT ZZZZ (Units XXX)	A201.D MACT ZZZZ (Units XXX)
	A202 Glycol Dehydrator – Not required	A202 Glycol Dehydrator – Not required
X	Part B General Conditions	Part B General Conditions, entire Section updated

16.0 Permit specialist's notes to other NSR or Title V permitting staff concerning changes and updates to permit conditions.

- A.
- B.